



Local Development Plan 2030

Retail and Main Town Centre Uses

Supplementary Planning Guidance
November 2024

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**Mid & East
Antrim**
Borough Council

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1.0 Introduction

- 1.1 This Supplementary Planning Guidance (SPG) provides additional guidance specific to retail and other town centre development in Mid and East Antrim Borough. It is intended for use by applicants, the public and by the council in the assessment and delivery of planning proposals for retail and other town centre development within the Borough.
- 1.2 Supplementary Planning Guidance represents non-statutory planning guidance that supports, clarifies and/or illustrates by way of example, policies included within the current planning policy framework, including development plans and regional planning guidance. The information set out in this SPG is therefore a material planning consideration in determining planning applications and should be read in conjunction with the existing planning policy framework, most notably the Strategic Planning Policy Statement (SPPS) for Northern Ireland and the Mid and East Antrim Borough Council Local Development Plan (LDP).
- 1.3 The Retail policies aim to protect and sustain the vitality and viability of our established town centres and small town centres so they can perform to their maximum potential in meeting the needs of the citizens and visitors and contribute to the economy of Mid and East Antrim. They promote established town centres as the appropriate first choice location for retailing and other main town centre uses and require a sequential approach to the identification of sites for retailing and main town centre uses, to minimise the impact of out of centre retailing and to protect and enhance diversity in the range of town centre uses.
- 1.4 In order to aid the effective implementation of relevant retailing policies, the Council considers it prudent to produce this guidance. It is aimed at providing further clarity to landowners, developers and agents. It does not introduce new policy. It aims to ensure that the existing policy is implemented and applied consistently and effectively through the development management process.
- 1.5 Mid and East Antrim Borough Council encourages and welcomes early engagement with applicants to agree the scope of any sequential and/or impact test. Applicants are advised to utilise the council's Pre-Application Discussion (PAD) scheme, where appropriate, to discuss any planning issues and agree the scope of the assessment at an early stage before the submission of a planning application.
- 1.6 Primarily, this SPG provides guidance on the implementation of Policies SGS7, RET 1 and RET 2.
- 1.7 For additional guidance relating to main town centre uses which are considered sensitive in nature please refer to the Sensitive Uses Information leaflet. These uses include amusement centres, bookmaking offices, restaurants, cafes and fast-food outlets, taxi offices and public houses.

2.0 The Sequential Test – Policy RET1

- 2.1 Policy RET1 provides the proposed policy approach in relation to the sequential test for planning applications for retail and other town centre uses.

Policy RET1 (First Half)

Proposals for retail development will be permitted within town centre and small town centre boundaries where defined. For other locations, a sequential approach to site selection will be applied in the following order of preference:

- a) Edge of Town Centre boundary (i.e. adjoining it or normally within 300 metres); and
- b) Out of centre locations (i.e. outside the town centre boundary but within settlement limits) where sites are accessible by walking, cycling and public transport.

Proposals for other town centre uses (cultural and community facilities, leisure, entertainment and businesses) shall also follow the same sequential approach.

What is the Sequential Test?

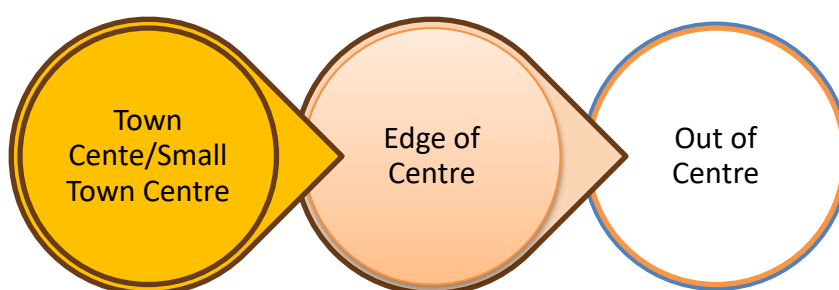
- 2.2 The sequential test is an approach that seeks to direct relevant development to within town or small town centres before an edge of centre or out of centre site. It supports the viability and vitality of town centres by placing existing town centres foremost in both plan-making and decision-taking.
- 2.3 In the Mid and East Antrim context, there are four tiers in the Retail Hierarchy - town centres, small town centres, local centres and village centres (including designated small settlements). Policy RET1 refers to the top two tiers of the Retail Hierarchy.

Figure 1 Mid and East Antrim Retail Hierarchy

Tier	Title	Description	Centres
1	Town Centres	Provides (or has the potential to provide) a range of shops, services, businesses and community facilities to a significant hinterland which includes smaller neighbouring towns or suburbs.	Ballymena Carrickfergus Larne
2	Small Town Centres	Provides (or has the potential to provide) a range of shops, services, businesses and community facilities to serve a hinterland which includes neighbouring small towns and villages.	Whitehead Ahoghill Broughshane Cullybackey Portglenone ⁷
3	Local Centres	Provides (or has the potential to provide) a limited range of shops, services, businesses and community facilities to serve the immediate local area.	Greenisland Galgorm
4	Village Centres ⁸	Provides (or has the potential to provide) a limited range of shops, generally comprising a grocery store, occasionally a petrol filling station, and other small shops of a local nature serving a small village and surrounding rural area.	Kells/Connor Cargan Carnlough Clough Martinstown Ballygalley Ballystrudder Glenarm Glynn Ballycarry

- 2.4 The sequential approach guides retail and other town centre uses to sites within town centre or small town centre locations first. If no town or small town centre sites are available, suitable or viable, developers should consider an edge of centre location. Only when town or small town centre locations or edge of centre locations are thoroughly examined and ruled out, can consideration be given to an out of centre location. In such cases the developer will still be required to demonstrate that the proposal will not harm existing centres in the catchment.
- 2.5 For clarity, the centres will be defined at the Local Policies Plan (LPP) stage of the Mid and East Antrim LDP, but until the LPP is adopted the town centre boundaries and 'commercial centre' designations as defined in the existing Area Plans will be taken as the town centre boundaries. This is set out in footnote 28 of the Plan Strategy.
- 2.6 The sequential test to site selection for retail and other main town centre uses will therefore require applicants to consider sites in the following order of preference:

Figure 2 Sequential order for site selection



- 2.7 Where it is established that an alternative sequentially preferable site or sites exist within the proposal's retail catchment, an application which proposes development on a less sequentially preferable site should be refused.
- 2.8 Compliance with the sequential test however does not guarantee that permission will be granted. The council will have to consider all other material considerations in reaching a decision including an assessment of the impact and need of the proposal, if appropriate. The following sections of this document provides further detail on impact and need tests.
- 2.9 Where proposals relate to extensions to existing retail development, the sequential test will also be applied. This approach is in line with the SPPS which does not draw a distinction between new development or extensions to existing development in the application of the sequential test.

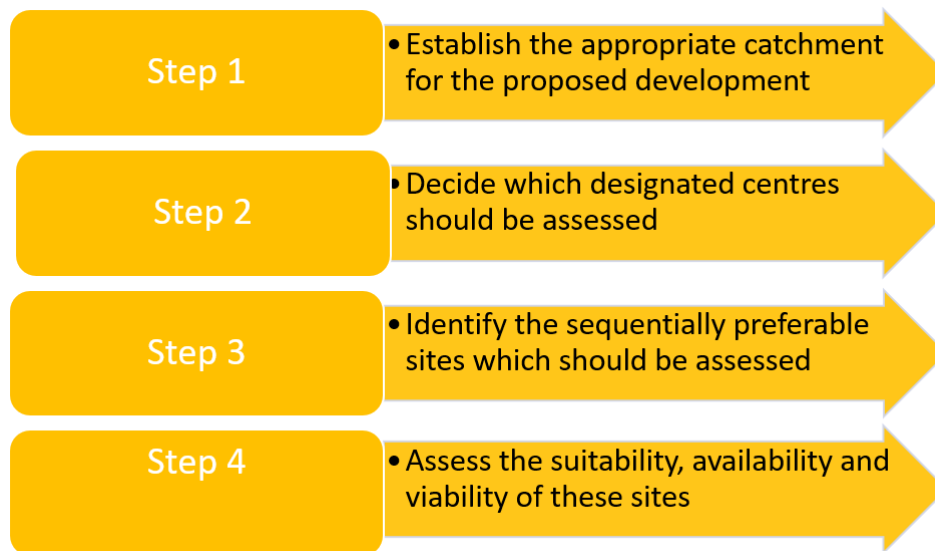
When is a sequential test required?

- 2.10 A sequential test should be applied when an application for retail or other town centre development is proposed either in an edge of centre or an out of centre location. This is in line with Policy RET1 of the Plan Strategy and the SPPS.
- 2.11 The designated centres for Mid and East Antrim are town centres and small town centres as indicated in Policy SGS7 of the Plan Strategy, which sets out the Retail Hierarchy. As outlined in paragraph 2.5 above, the town centre boundaries of Ballymena, Carrickfergus and Larne town centres defined in Ballymena Area Plan 1986-2001, Carrickfergus Area Plan 2001 and Larne Area Plan 2010 and the commercial centres defined in the Ballymena Area Plan 1986-2001 for Ahoghill, Broughshane, Cullybackey and Portglenone should be used during the transitional period between the adoption of the Plan Strategy and the adoption of the Local

Policies Plan. Whitehead is the only remaining small town in the Retail Hierarchy and it does not have a commercial centre defined in the Carrickfergus Area Plan 2001. Therefore, until the adoption of the LPP, sites anywhere within Whitehead settlement limit are considered appropriate in terms of sequential preference.

Carrying out a sequential test.

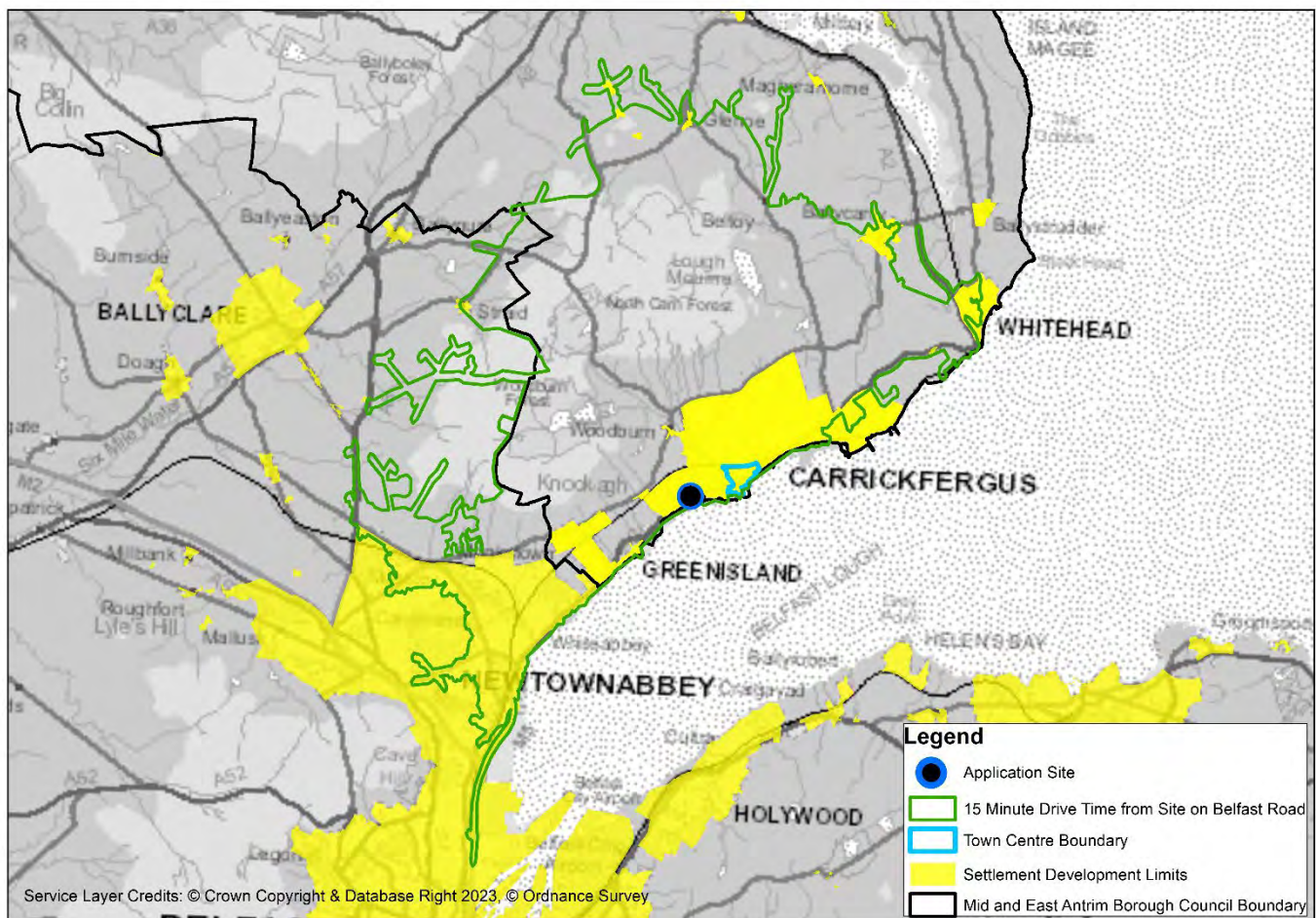
2.12 There are four key steps to follow when undertaking a sequential test. (Figure 3)



Step 1: Establish the appropriate catchment for the proposed development

- 2.13 The catchment is the area the proposal is intended to serve/draw trade from. This will vary depending on the specific development proposed and the applicant will need to suggest an appropriate drive time from the proposal site, taking into account the size and type of development, the market in which the development will operate, any relevant characteristics of the business/operator model and where competitor developments are located.
- 2.14 For example, if a 1,000 sq. m food store came forward in a small town with little by way of existing competition, then it might be expected to draw trade from quite a large catchment area, including several hinterland settlements. However, if a 1,000 sq. m food store came forward in the suburb of a main town, then it might have considerable nearby competition which people would be unlikely to drive past, meaning its catchment area would be much smaller.
- 2.15 The map at Figure 4 demonstrates an example of an acceptable approach to defining a catchment for a retail application near the council boundary. The map shows, in this case, a 15 minute drive time from the out of centre proposal site located to the south-west of Carrickfergus town centre, with the catchment extending into Antrim/Newtownabbey Borough Council area. An incorrect approach would be to stop the catchment at the council boundary.

Figure 4 Example of how to define a retail catchment close to the council boundary.



- 2.16 Alternatively, the catchment area that the proposal is intended to serve/draw trade from could be defined by selecting relevant postcode sectors and illustrating their extent and the location of the proposal on a map. Again, this will vary depending on the specific development proposed, taking into account the size and type of development, the market in which the development will operate, any relevant characteristics of the business / operator model and where competitor developments are located. However simply selecting one of the eight zones shown in the 'Retail Study Map' in Appendix A of Council's *Retail & Commercial Leisure Need & Capacity Study*, within which a proposal falls, is not normally acceptable, unless the proposals catchment coincidentally happens to align.

Step 2: Decide which designated centres should be assessed

- 2.17 Having established an appropriate catchment, this can then be used to help determine the centres which should be assessed for sequentially preferable sites, in conjunction with details of the type and size of proposed development. The centres to be considered are town centres and small town centres within the catchment which may include centres in other Councils. Referring to the map above, all designated town centres highlighted in yellow which are relevant to the type and size of this proposed development inside the established catchment area would require to be assessed for sequentially preferable sites. The application of the sequential approach requires flexibility and realism from the developers and retailers as well as the council being responsive to the needs of retailers.

Step 3: Identify the sequentially preferable sites which should be assessed

- 2.18 The assessment should consider sequentially preferable sites – i.e. first those within designated centres and then, if these are unavailable, unsuitable or unviable or any combination thereof, sites in an edge of centre location need to be considered. Edge of centre for such proposals would be a location that is well connected and within easy walking distance, normally within 300m of the town centre or small town centre boundary. A site would be unlikely to be considered well connected where it is separated from the town centre by barriers such as railway lines, busy roads or lack of pedestrian access. Out of centre locations need to be sites which are accessible by walking cycling and public transport.

Step 4: Assess the availability, suitability and viability of these sites

- 2.19 The SPPS states that flexibility may be adopted in seeking to accommodate developments onto sites with a constrained development footprint. For example, through use of creative and innovative design schemes, including multi-level schemes, or smaller more efficient trading floors/servicing arrangements. Applicants will be expected to identify and fully demonstrate why alternative sites are not available, suitable or viable. The SPPS is silent on a definition of availability, suitability and viability. However, to provide clarity and greater certainty around this aspect of the sequential test, the council considers it important to elaborate on the definitions in the Plan Strategy.

Availability	<p>This refers to sites that are available now or are likely to become available for development within a reasonable period.</p> <p>A site will be considered available for development when, on the best information available (such as searches), there is confidence that there are no legal or ownership problems, such as multiple ownerships, ransom strips, tenancies or operational requirements of landowners.</p> <p>Where sites become available unexpectedly after receipt of a planning application, the council will take this into account in its assessment of the application.</p> <p>Applicants will be required to submit evidence of any insurmountable legal or ownership problems that renders a site “unavailable”.</p>
Suitability	<p>When judging the suitability of a site it is necessary to have a proper understanding of the appropriateness and likely market attractiveness for the type, scale and form of the development needed, and what aspect(s) of the need are intended to be met by the site.</p> <p>When assessing suitability there will be a requirement to have regard to the circumstances of the particular town centre when preparing proposals, as regards the format, design, and scale of the development. As part of such an approach there is an expectation to consider the scope of accommodating the proposed development in a different built form. Sequentially preferable locations should be thoroughly assessed on that footing¹. It is not sufficient to say a site is not suitable as it is too small for a standard trading model of the developer, without fully demonstrating consideration of alternative formats, designs, or scales of the proposal.</p> <p>The following factors are also likely to be relevant when assessing whether a site offers a suitable location for development:</p> <ul style="list-style-type: none">• policy restrictions – such as designations, protected areas, and existing planning policy• physical problems or limitations – such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination;• potential impacts – including effect upon landscape features and conservation and the environmental conditions.

<p>Viability</p>	<p>This test is concerned with judging whether there is a reasonable prospect that development will occur on a site. This is likely to be influenced by:</p> <ul style="list-style-type: none"> • market factors – such as adjacent uses, economic return of existing, proposed and alternative uses in terms of land values, attractiveness of the locality and level of potential market demand: • cost factors – including site preparation costs relating to any physical constraints, any exceptional works necessary, relevant planning standards or obligations, prospect of funding or investment to address identified constraints or assist development; and • delivery factors – including the developer’s own phasing, the realistic build-out rates on larger sites (including likely earliest and latest start and completion dates), Section 76 costs, whether there is a single developer or several developers and their size and capacity etc.
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¹UKSC 2011/0079 Tesco v Dundee City Council (paragraph 28)

3.0 The Assessment of Need and Impact Assessment in Policy RET1

Policy RET1 – Retail in Town Centres (second half)

There will be a presumption to refuse a retail application outside town centre and small town centre boundaries unless the applicant can demonstrate that:

- a) alternative sites within these locations are either not suitable, not viable or not available (or any combination thereof); and
- b) there is a qualitative and/or quantitative need for the proposal; and
- c) there will be no significant adverse impact on any centre within the whole catchment.

All proposals must meet the General Policy and accord with other provisions of the LDP.

- 3.1 Part a) in the policy box above has been covered under Step four of the four step approach. However, Policy RET1 of the Plan Strategy requires that for retail proposals under the Policy RET2 thresholds or proposals for other town centre uses which fall outside town centre boundaries, applicants will also have to demonstrate a qualitative and/or quantitative need for the proposal and that there will be no significant adverse impact on any centre within the catchment of the proposal.
- 3.2 The assessment of need should incorporate a quantitative and/or qualitative assessment taking account of the local town and factor in the need already met/proposed to be met by any committed development proposals. Allocated sites also need to be considered.
- 3.3 A Qualitative Assessment contrasts the existing quality of goods, services, or retail environment on offer within the defined catchment area, and whether the proposed development would help to address any existing deficiencies or 'gaps' in the market, and/or offer any beneficial broadening of choice and competition. A quantitative assessment is a numerical exercise to analyse whether there is a floorspace need for particular types of retail goods or services within the identified catchment area. This work may draw on the council's own *Retail & Commercial Leisure Need & Capacity Study* (or any subsequent update to that document), or an applicant may undertake their own assessment of qualitative need. Any assessment should be based on up-to-date population, expenditure and where relevant, survey data.
- 3.4 The impact assessment is required to gauge the potential impacts of proposals for retail or other town centre uses, on edge of or outside existing centres, on the vitality and viability of existing centres i.e. the town and small town centres listed in the retail hierarchy above. Whilst applicants do not have to prepare a detailed RIA for proposals with gross floor space less than the thresholds outlined in Policy RET2, they must still consider whether the proposals are likely to have any undue impact on existing centres. This should be through consideration of the likely trading overlap with existing nearby traders and, in a positive sense, justification for the gap in the market which is perceived to justify the proposal (e.g. demonstrating that the existing centre does not provide for certain goods resulting in residents having to make lengthy and unsustainable journeys to acquire such goods). The scope and detail of the impact assessments should be agreed with the council in consultation with consultees where relevant, prior to submission.

4.0 Retail Impact Assessment – Policy RET2

- 4.1 Developers will be expected to submit a Retail Impact Assessment (RIA) for all applications including extensions proposed outside town centre or small town centre boundaries, for retail or other town centre uses that are above the thresholds outlined in Policy RET2.

Policy RET2 – Retail Impact Assessment

All applications, including extensions for retail development and town centre uses, above the thresholds identified below, must be accompanied by a Retail Impact Assessment (RIA) where the proposal is located outside town centre or small town centre boundaries.

- Above 750sq. m gross external area outside Ballymena and Larne town centre boundaries.
- Above 500sq. m gross external area outside Carrickfergus town centre and small town centre boundaries.

Outside town centre and small town centre boundaries, but within the town's settlement limit, permission may be granted for a small scale convenience shop which does not exceed 100sq. m gross external area, where it can be demonstrated that:

- a) it meets a defined local need which cannot be met within an existing centre; and
- b) it will not adversely affect the vitality and viability of existing centres within its catchment.

The Retail Impact Assessment should provide a proportionate response to the proposal being sought and should incorporate an assessment of need, impact and the sequential approach.

Where proposals are considered to cause significant adverse impacts on any of the relevant criteria, or where in balancing overall impacts on each of the relevant criteria, the proposal is judged to be harmful, then it should be refused.

- 4.2 The SPSS gives councils the flexibility to set an appropriate threshold for their area, above which all applications for retail or town centre type developments should be accompanied by an assessment of retail impact and need.
- 4.3 In the Ballymena and Larne context the high vacancy rates and average unit sizes were the two indicators used to consider the reduced RIA thresholds and it was considered that a threshold of 750sq. m was appropriate as the average unit sizes in 2018 were 263sq. m and 202sq. m respectively. In Carrickfergus the particularly high vacancy rates and smaller average unit size of 187sq. m deemed the RIA threshold of 500sq. m appropriate. Anything above these thresholds could have the potential to cause significant adverse impacts on the vitality and viability of the towns and small towns in the retail hierarchy.
- 4.4 Policy RET2 therefore identifies that proposals for retail or other town centre uses of 750sq. m gross or above for Ballymena and Larne and 500sq. m gross for Carrickfergus, on the edge of, or outside designated centres, must be accompanied by an impact assessment and an assessment of need.
- 4.5 Whilst the council acknowledges that there are several different methodologies to carry out a Retail Impact and/or Need Assessment, the council's preferred method is a Step-by-Step approach. This approach identifies the catchment of the proposal by considering an appropriate drive time and the trade draw within each drive time band. The council considers this approach to be more transparent and easier to assess as opposed to other methodologies including the market share approach which can be considered to lack transparency and may result in longer processing times due to the complexity of the assessment.

- 4.6 It is for the applicant to demonstrate compliance with the impact test, having considered the factors listed in the SPPS, in support of relevant applications. Failure to undertake an impact test could constitute a reason for refusing permission.
- 4.7 The impact test will need to be undertaken in a proportionate and locally appropriate way, drawing on existing information where available. Where possible applicants are advised to seek pre-application advice from the council on the information to be included in any RIA which must be submitted as part of a retail application.

What is an impact assessment?

- 4.8 An impact assessment is a methodologically evidence based approach to determine the relative effect that a proposed development will have on the wider centre hierarchy. The purpose of the impact assessment is to consider the impact over time of certain edge of centre and out of centre proposals on the health of existing centres within the catchment and any impact on planned investment. The test relates to retail and other town centre uses which are not in accordance with up-to-date plan policies and which would be located outside existing centres. It is important that the impacts assessed relate to all town and small town centres within the proposal's catchment, and not necessarily just those closest to the proposal. The affected centres may be within neighbouring authority areas and these also need to be assessed.
- 4.9 The impact of proposals on the trading position of existing centres and/or standalone facilities within the catchment area of the proposal should be assessed. Proposals should consider impact on a 'goods' basis (i.e. an assessment of the like-for-like impact on similar traders). If a proposal incorporates both convenience and comparison goods, then potential impacts on traders selling one or both categories of goods should be considered.
- 4.10 Importantly, applicants will be expected to have based their impact conclusions against an up-to-date consideration of the health of existing centres. There is no 'rule of thumb' on retail impact. A 1% impact on the turnover of a struggling centre could be more harmful than a 10% impact on a healthy centre. Establishing the baseline position in respect of the health of the centres within the catchment area is therefore an important exercise in preparing an impact assessment. This assessment should draw from the health-check considerations set out in the SPPS.
- 4.11 The impact assessment should also consider whether proposals in certain locations would impact on existing, committed and planned public and private investment, or on the role of particular centres. It will therefore be important for applicants to have a clear picture of committed developments (either extant planning permissions, or planned investment) of relevance to the proposals.
- 4.12 The proposal needs to assess whether its chosen location impacts on sites designated in the extant Area Plans (pre LPP adoption) or the LPP when adopted.
- 4.13 Cumulative impact needs to be assessed taking account of committed and planned development, including plan commitments within the town centre and wider area. This will be discussed in more detail in step three below.
- 4.14 A review of local economic impacts, which may include, but is not limited to, a consideration of the net impact on jobs as a result of the proposals should be carried out, taking account of the modelled diversion of trade from other operators/centres.

When is an Impact Assessment required?

- 4.15 Proposals for small scale convenience shops outside of town or small town centres but within the town's settlement limits, which do not exceed 100sq. m gross floor area may be granted permission without the requirement to do a RIA if it can be demonstrated that it meets a defined local need and it will not adversely affect the vitality and viability of existing centres within the catchment. For example, a small convenience shop located within a large residential area on the outer limits of a settlement would serve the day-to-day

needs of that local community without having an adverse impact on larger town centre convenience stores. Applicants should consider any 'gaps' in the current coverage of convenience goods provision to evidence their case.

Scope of Impact Assessment

- 4.16 The basis of any assessment will normally consider potential impacts on designated centres within the catchment area, as well as a range of sites to consider under the sequential test. In line with best practice, impact should be considered over time, up to five years for most schemes.
- 4.17 Where proposals relate to a specific type of goods (for example, a DIY retail warehouse) it may be appropriate to focus the impact assessment on that specific sector, notwithstanding the need to consider the impact of the proposal on the overall vitality and viability of centres. In such instances, appropriate conditions to restrict the development in line with the impact assessment undertaken, will be imposed.
- 4.18 If unconditional consent is sought for retail or other uses (for example, with no limitation on net sales area, unit sizes, range of goods and so on) then the supporting assessment should examine all of the potential impacts and policy compliance of the full range of possible permutations which would be permitted under the proposed planning permission.
- 4.19 In assessing the impact of the proposal on existing, committed and planned public and private investment, consideration should be given to a range of factors including:
- What stage they have reached e.g. are they contractually committed?;
 - The policy 'weight' attached to them (for example, are they a key provision of the development plan?);
 - Whether there is sufficient 'need' for both the proposal and the existing/committed/planned investment?;
 - Whether they are competing for the same market opportunity, or key retailers/occupiers?;
 - Whether there is evidence that retailers/investors/developers are concerned; and
 - Whether the cumulative impact of both schemes would be a cause for concern.
- 4.20 Where the catchment extends into other council areas, the council may ask for input from the relevant neighbouring council(s) in identifying factors which should be taken into account in any assessment, and in providing any relevant information, such as monitoring data, retail and leisure studies, or town centre health check data.
- 4.21 The council's most recent *Retail & Commercial Leisure Need & Capacity Study* should provide a starting point to inform any impact assessment, but the applicant should consider whether updates are appropriate depending on the length of time that has passed since this study, or its most recent update was published. For growth rates, spend per head and special forms of trading etc. the most up-to-date data sources should be used to update figures. Town centre vacancy rates can be found in council's town centre land use surveys. Other sources such as Experian GOAD are available however the extent of their survey may not follow the same extent as the designated town centre boundaries so a combination of sources should be considered.
- 4.22 Ideally a common data source should be used where possible when quoting figures such as turnover etc, however if this is not possible an explanation should be given as to why multiple sources are being used.
- 4.23 A judgement as to whether the likely adverse impacts are significant can only be reached in light of local circumstances (for example, in areas where there are high levels of vacancy and limited retailer demand, trade diversion from a new development may lead to a significant adverse impact).
- 4.24 Evidence showing that there would be no likely significant impact on a town centre or small town centre from an edge of centre or out of centre proposal, does not guarantee that permission is granted. The council will have to consider all material considerations in reaching a decision including the sequential test and need, if appropriate.

Methodology for Step-by-Step Approach to carrying out a Retail Impact and Assessment of Need

Step 1: Identification of the Catchment Area

- 4.25 The identification of the catchment area, and the proportion of trade drawn from this area, is an important stage in the RIA and it will directly affect the assessment of trade diversion from competing centres and retail impact. If the proposal is to be situated out of centre or at an edge of centre site, the applicant must consider the likely catchment of the proposal with reference to travel distances determined from survey of comparable facilities elsewhere in the borough. If no comparable facilities are located within the Mid and East Antrim council area, then comparison should be considered for facilities elsewhere in Northern Ireland.
- 4.26 In addition to determining the catchments of the adjacent centres, the catchment area needs to be sufficiently wide enough to ensure that the influence of the proposal can be assessed.

Step 2: Determine the appropriate time frame for assessing impact, focusing on impact in the first five years (up to design year):

- 4.27 The base year for impact testing should generally be selected to represent the year when the proposal application has been submitted.
- 4.28 The design year for impact testing should be selected to represent the year when the proposal has achieved a 'mature' trading pattern. This is conventionally taken as the second full calendar year of trading after opening of each phase of a new development, but it may take longer for some developments to become established.

Step 3: Examine the 'no development' scenario:

- 4.29 This should not necessarily assume that all centres are likely to benefit from expenditure growth in convenience and comparison goods and should reflect both changes in the market or role of centres, the impacts of online shopping as well as changes in the environment such as new infrastructure. The effects of wider trends therefore need to be considered.
- 4.30 Longer term trends and local market dynamics are likely to indicate that some retail destinations are going to improve while others decline, irrespective of the proposed planning interventions. Therefore, further factors need to be considered in examining the "no development" scenario.

Commitments/Cumulative Impact

- 4.31 Applicants must consider the effect of known commitments and consider the cumulative impact of the proposals in question.
- 4.32 In judging which commitments should be considered, it will be relevant to consider, amongst other things, the likelihood of them being implemented, and their potential scale and significance. The range of factors to be considered are detailed at paragraph 4.19 above.
- 4.33 In the case of proposals which are not in accordance with an up-to-date local development plan and not within an existing centre, their effects on a planned investment in a nearby centre may be highly material.
- 4.34 Equally, any adverse impacts as outlined above should be balanced against the positive effects of the proposals, in terms of investment; employment generation; social inclusion; and physical and economic regeneration.

The 'fall-back' scenario

- 4.35 Where relevant, a further consideration is the so called 'fall back' scenario, i.e. where through an extant permission or permitted development rights it is argued that there is a 'fall back' position which may be implemented if the current proposal is not approved.
- 4.36 It is possible in some cases that a specific proposal may have a lesser impact than the proposal for which consent is being sought. Alternatively, an application might provide the opportunity to impose planning restrictions which could mitigate impact. However, in judging the relevance of a 'fall back' position, the following factors should be considered:
- First, the relevance of a fall-back position should be judged having regard to the likelihood of it being implemented. There is a difference between a purely 'hypothetical' fall-back position, and a position which could be implemented. If there is a realistic prospect that the fall-back position would be brought forward, then it would be necessary to attach appropriate weight to it in judging the impact of the proposal in question.
 - Second, when comparing the impact of a proposal with a fall-back position, it will be relevant to consider the impact of the proposal together with the cumulative impact of other known commitments within the catchment, rather than just the 'incremental' impact of the difference between the two. This applies to all impact assessments, where the relevant test is the cumulative impact of the proposal in question.

Step 4: Assess the proposal's turnover and trade draw:

- 4.37 This can be achieved by drawing on information from comparable schemes, the operator's benchmark turnover of convenience and comparison goods, and carefully considering likely catchments and trade draw. The relative offer of goods, and the geography of competing destinations, will both be key considerations in respect of determining trade draw. Applicants should set out a transparent assessment of trade draw, detailing likely draws in both percentage and monetary terms.

Step 5: Consider a range of plausible scenarios in assessing the impact of the proposal on existing centres and facilities:

- 4.38 This may require breaking the study area down into a series of zones to gain a finer-grain analysis of anticipated impact (for example, by drive-time band or postcode sector). This may also require inclusion of committed developments within the catchment area (proposals that have gained planning permission and can therefore be developed).

Step 6: Set out the likely impact of the proposal, along with any associated assumptions or reasoning, including in respect of quantitative and qualitative issues:

- 4.39 Any conclusions should be proportionate, for example, where a smaller proposal is concerned, it may be sufficient to give a broad indication of the proportion of the proposal's trade draw likely to be derived from different centres and facilities in the catchment area and the likely consequences to the viability and vitality of existing town centres. However, for larger proposals, which have more obvious trade draw repercussions, a more detailed assessment will be required. As per earlier guidance, in all instances, the impact of the proposals should be clearly related to up-to-date health-checks of existing centres within the catchment area.
- 4.40 A Proposal in an out-of-centre location cannot claim to contribute to capacity figures shown in the councils *Retail & Commercial Leisure Need & Capacity Study* without also successfully demonstrating compliance with the sequential, needs and impact tests too. Capacity is not a target to be reached. There should therefore be no sense that an out of centre proposal necessarily 'contributes' to meeting a need without further

justification. It may be that, if there is no sequentially preferable site, and that impacts are acceptable, an out of centre proposal is helpful in some instances (e.g. if it contributes towards saving lengthy return journeys to far-away places). However, it may equally be the case that an out-of-centre proposal would offer little or no help or might impact the town centre unacceptably. In that instance, the town would be better off without the proposal as the proposal does not contribute at all.

- 4.41 While thresholds are expressed in gross terms in regional policy and consequently in policy RET2, it is acceptable for impact to be calculated in net terms as normally the trading area of a proposal is used to align with the sales density to estimate the projected turnover of the proposed development.
- 4.42 If a proposal includes multiple areas of trading floorspace such as a main building and a separate building or outdoor area, such as a garden centre, impact has to be assessed based on the total of all trading floorspace.
- 4.43 If a proposal is claiming to improve the qualitative offer or increase diversity, choice and competition with its proposed goods type(s), an assessment is expected as a minimum, of existing diversity and choice and an assessment of what 'gaps' might exist which the proposed operator would fill, for example by listing existing retailers with similar offers and examining the overlap of trade.
- 4.44 A retailer's commercial 'need' to be in a certain location is not evidence enough of qualitative need.
- 4.45 To date, the focus of impact assessments has been on retail proposals, particularly the key town centre impacts. However, for other non-retail uses which are still considered 'other town centres uses' it is unlikely that several of the key impacts set out in policy will be considered in the same level of detail (e.g. trade diversion). There may be cases, for example, where a key town centre site is earmarked for a particular mix of uses, which depends on securing key occupier requirements. There may be a legitimate concern that a new development will cause displacement and/or deflect occupier demand to a less central location.
- 4.46 In every case it will be necessary to reach a balanced decision, having regard to the provisions of the development plan, the sequential approach and impact considerations.

5.0 Needs Assessment – Policy RET2

What is an assessment of need?

- 5.1 An assessment of need identifies the needs of consumers and the requirements of retailers, leisure operators and others proposing development for town centre uses.
- 5.2 The SPPS states that when undertaking an assessment of need, this should be proportionate to support the application and may incorporate a qualitative and quantitative assessment of need taking account of the sustainably and objectively assessed needs of the local town and take account of committed development proposals and allocated sites.
- 5.3 The basis of any needs assessment will normally consider the proposed expenditure growth of the council area and quantum need for floorspace, minus the floorspace required for committed developments.
- 5.4 A quantitative needs assessment requires the following steps:
- Identification of catchment area, base and design years for the assessment;
 - Identification and projection up to design year of population and total available expenditure within the catchment area;
 - Estimation of the proposal's turnover; and
 - Estimation of capacity within the development to include committed developments.
- 5.5 A Qualitative Assessment contrasts the existing quality of goods, services, or retail environment on offer within the defined catchment area, and whether the proposed development would help to address any existing deficiencies or 'gaps' in the market, and/or offer any beneficial broadening of choice and competition.

Appendix 1: Glossary of Terms and Abbreviations

Glossary of Terms

Capacity	Forecast resident spending within the catchment area, with which to support existing and additional retail floorspace.
Centre(s)	Refers to the main town centres of Ballymena, Carrickfergus and Larne, Small town centres of Ahoghill, Broughshane, Cullybackey and Portglenone (pre LPP the small town centres are known as Commercial Centres) Whitehead town centre (Pre LPP Whitehead Settlement Limit will act as the town centre).
Commercial Centre	Designation of the largest concentration of shopping within a town or small town centre.
Comparison Goods	Durable items for which customers are prepared to travel some distance to compare prices and quality. They include clothes, footwear, household durables, textiles, fashion accessories, toys, hardware and leisure goods.
Comparison Goods (Bulky)	This is a subset of comparison goods retailing. It describes those comparison goods which are difficult to accommodate in town centres because of their space requirements for large showrooms, parking and servicing. They typically include large items such as furniture, carpets, electrical/white goods and DIY goods, and are typically sold from retail warehouses.
Convenience Goods	Mainly groceries and other consumable commodities that are purchased regularly and usually locally. They include food, drink (including take home alcohol), tobacco, newspapers, magazines, cleaning materials and toiletries.
Edge-of-Centre	For retail purposes, a location that is well connected and within easy walking distance (i.e. normally 300 metres) of the town centre boundary. In determining whether a site falls within the definition of edge-of-centre, account should be taken of local circumstances such as barriers, railway lines or major roads.
Expenditure	Average annual expenditure levels for various forms of goods, multiplied by the population within the defined Study Area.
Experian GOAD	A retail property intelligence system that helps retail developers, property investors, planning professionals, and commercial agents to identify profitable locations for retail property development and investment projects. It offers comprehensive retail location plans and easy to use reports covering over 3,000 shopping areas in the UK and Ireland.
Financial, Professional & other Services	Services provided to visiting members of the public such as banks, building societies, employment agencies, legal services, estate agents and business services.
Gross Floor Area	This is the total floor area of a building measured externally.
Gross Retail Area	This is the total internal retail floorspace, as measured from inside the retail unit and includes sales space storage space and ancillary space, including offices, toilets and canteen.
Leisure Services	An Experian Goad category for town centre leisure units which includes bars, cafes, cinemas, nightclubs, take-aways, hotels, public houses, and restaurants. For clarity, it does not include facilities for leisure pursuits e.g. sports centres, swimming pools or health & fitness clubs.
Local Policies Plan (LPP)	The second part of the Local Development Plan, the LPP is prepared by Council following adoption of the Plan Strategy.
Main Town Centre uses	Retail development, Use Class A1 shops, Use Class A2 financial, professional and other services, Use Class B1 businesses, cultural and community facilities, leisure and entertainment.
Market Share	The proportion of residents that visit a particular retail destination, derived from household survey results.

Net Retail Area	This is also referred to as sales space and includes the area of the unit which is devoted to the display and sale of retail goods. It includes checkout counters, packing zones, circulation space from check-outs to exit lobby, changing rooms and information areas. Net retail floorspace is calculated by way of internal measurement to the inner face of the wall.
Out-of-Centre	A location outside a centre boundary but within defined settlement limits.
Population Projections	Estimates of future population based on the most recent census and/or NISRA populations estimates and applying NISRA population trends.
Retail Floorspace	Total floor area of the property that is associated with all retail uses in square metres. May be expressed as a net figure (the sales area) or in gross (including storage, preparation and staff areas).
Retail Hierarchy	Towns, Small Towns, Local Centres and Village centres (including small settlements).
Retail Services	An Experian Goad category comprising the likes of dry cleaners, health & beauty, opticians, photo processing, post offices and travel agents.
Retail Warehouse	Large single-level individual store, with car parking, for the sale of bulky comparison items such as DIY goods, furniture, electrical goods, carpets and gardening goods.
Retail Impact	The potential effects of proposed retail development upon existing shops.
Sales Density	Turnover, per square metre. Various retail planning sources such as Verdict UK Food & Grocery Company Briefing Reports and Mintel Retail Rankings provide average (or benchmark) sales densities for national multiple convenience retailers.
Sequential Approach	A planning principle that seeks to identify, allocate or develop certain types or locations of land before others. For example, brownfield housing sites before greenfield sites, or town centre retail sites before out-of-centre sites.
Special Forms of Trading	Special forms of trading (SFT) are defined as sales via the internet, mail order, stalls and markets, vending machines, door-to-door and telephone sales, including online sales by supermarkets, department stores and catalogue companies.
Town Centre	Town centres which provide a broad range of facilities and services and which fulfil a function as a focus both for the community and for public transport.
Town Centre Health Check	Town centre health checks are an important starting point to ensure the vitality and viability of town centres are maintained/improved. Town Centre Health Checks are carried out by the council and their outcomes are fed into the assessment of impact of proposals on the vitality and viability of town centres. Applicants should make themselves aware of the existing/current health check for town centres as this information will be used by the council when assessing your application. Health checks will be carried out at least every five years.
Trade Draw	Trade draw is the proportion of trade that a development is likely to receive from customers within and outside its catchment area. It is likely that trade draw will relate to a certain geographic area (i.e. the distance people are likely to travel) and for a particular market segment (e.g. convenience retail). The best way of assessing trade draw where new development is proposed is to look at existing proxies of that type of development in other areas.
Turnover	Amount of Sales per Unit Area of Floorspace.
Viability	A measure of a town centres capacity to attract ongoing investment for maintenance, improvement and adaption to changing needs.
Viability	A measure of how busy a town centre is.

Glossary of Abbreviations

KSR	Key Site Requirement
LDP	Local Development Plan
PAD	Pre-Application Discussion
PS	Plan Strategy
RDS	Regional Development Strategy (2035)
SPPS	Strategic Planning Policy Statement for Northern Ireland (2015)

